

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA	:	
	:	<u>Protective Order re: 3500 and</u>
- v. -	:	<u>Attorneys' Eyes Only Material</u>
	:	
SOHAIL KHAN,	:	09 Cr. 1067 (JSR)
	:	
Defendant.	:	
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IT IS HEREBY agreed, by and between the United States of America, Damian Williams, United States Attorney, by Sarah Lai, Assistant United States Attorney, and the defendant Sohail Khan, by and through his attorney Valerie Gotlib, Esq., that, with respect to all materials produced under 18 U.S.C. § 3500 ("3500 Material") and other material previously designated for Attorney's Eyes Only ("AEO Material"):

(1) Defense counsel must destroy or return to the Government all 3500 Material and AEO Material (including all copies), at the conclusion of the trial of this matter or when any appeal has become final;

(2) Defense counsel may disclose 3500 Material (and any copies) to defendant Sohail Khan only in the presence of counsel, any paralegal or staff employed by the defense, and any expert witness the defense intends to use at trial (collectively, "Designated Persons");

(3) To the extent any Designated Person (or any other party not provided for herein) obtains any 3500 Material that is the subject of this Order, such 3500 Material shall not be further disclosed in any form, including but not limited to orally disclosing such information and posting such information on the Internet;

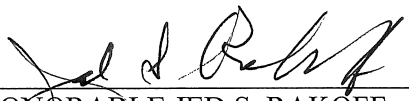
(4) Defendant Sohail Khan and his respective counsel of record shall provide a

copy of this Order to any Designated Persons to whom the 3500 Material is disclosed pursuant to paragraph 2. Prior to disclosure of such material to any Designated Person, pursuant to paragraph 2, any such Designated Person shall agree to be subject to the terms of this Order;

(5) AEO Material shall include the Government's memorandum of law filed on November 3, 2021, and defendant Sohail Khan's response filed on November 10, 2021. AEO Material shall not be disclosed in any form, including but not limited to orally disclosing such information, to defendant Sohail Khan or anyone else beyond defense counsel. If counsel for the defendant determines that the AEO Material is material and relevant to the investigation and defense of their client and requires counsel to share the information subject to this protective order with their client, counsel for the defendant reserve the right, on notice to the Government, to seek permission from the Court to do so.

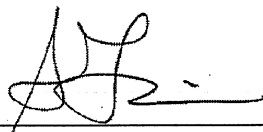
IT IS SO ORDERED.

Dated: New York, New York
November 15, 2021

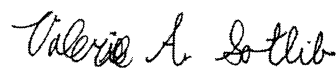


HONORABLE JED S. RAKOFF
United States District Judge
Southern District of New York

DAMIAN WILLIAMS
United States Attorney for the
Southern District of New York

By: 

Sarah Lai
Assistant United States Attorney



Valerie Gotlib, Esq.
Counsel for Defendant Sohail Khan